

1 DANIEL G. BOGDEN
 United States Attorney
 Nevada Bar No. 2137
 MICHAEL A. HUMPHREYS
 Assistant United States Attorney
 U.S. Attorney's Office
 333 Las Vegas Boulevard South, Suite 5000
 Las Vegas, Nevada 89101
 Telephone: 702-388-6336
 Facsimile: 702-388-6787
 Email: michael.humphreys@usdoj.gov
 Attorneys for the United States of America

<input checked="" type="checkbox"/> FILED ENTERED	<input type="checkbox"/> RECEIVED SERVED ON COUNSEL/PARTIES OF RECORD
JAN 21 2014	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 \$177,844.68 IN UNITED STATES
 CURRENCY,

14 \$296,746.66 IN UNITED STATES
 CURRENCY,

15 Defendants.
 16

Case No: 2:13-CV-100-JCM-(GWF)

18 **GOVERNMENT'S MOTION TO UNSEAL AND LIFT STAY**

19 On January 18, 2013, the United States of America, filed its forfeiture complaint, *in rem*, in the
 20 above-captioned case, and contemporaneously filed its motion to stay and seal these proceedings.

21 Among the reasons posited by the Government in its request to seal and stay was protecting the integrity
 22 and viability of any contemporaneous criminal investigation as it relates to the principals and/or subject
 23 matter as identified and described in that civil forfeiture complaint. This Court granted the motion to
 24 seal and stay on January 24, 2013.

25 Without waiving, or commenting further, on the viability of a criminal case against any or all
 26 of the principals in this civil forfeiture action, the United States represents that it has no further

1 objection to unsealing this case; nor does it object to the stay being lifted and the case moving
2 forward.


3 WHEREFORE, for the reasons, discussed above, the United States requests that the above-
4 captioned case be unsealed and that the stay be lifted so that any putative claimant(s) be served and
5 that the case, if opposed by a legitimate claimant (or claimants), progress(es).

6 Respectfully submitted this 21st day of January, 2014.

7 DANIEL G. BOGDEN
8 United States Attorney

9 
10 MICHAEL A. HUMPHREYS
11 Assistant United States Attorney

12
13 IT IS SO ORDERED:

14 
15 GEORGE FOLEY, JR.
16 United States Magistrate Judge

17 Dated: January 23, 2014
18
19
20
21
22
23
24
25
26